IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TERRENCE J. HANCOCK, *et al.*,    )
                                 )
            Plaintiffs,           )    CIVIL ACTION
                                 )
    vs.                           )    NO. 08 C 0300
                                 )
MARLENE'S TRUCKING IL, INC.,      )    JUDGE JOAN H. LEFKOW
an Illinois corporation,          )
                                 )
            Defendant.            )

**MOTION FOR ENTRY OF DEFAULT AND FOR AN ORDER
DIRECTING DEFENDANT TO TURN OVER
<u>MONTHLY FRINGE BENEFIT CONTRIBUTION REPORTS</u>**

NOW COME Plaintiffs, by their attorneys, and move for entry of default and for an

order directing MARLENE'S TRUCKING IL, INC., an Illinois corporation, Defendant herein, to

turn over monthly fringe benefit contribution reports due for the months of September 2007 through

the present date, pursuant to the Agreements and Declarations of Trust to which Defendant is bound,

said Defendant having failed to answer or otherwise plead to the Complaint and the monthly

contribution reports being required in order to liquidate Plaintiffs' claims.

On January 16, 2008, the Summons and Complaint was served on the Registered

Agent by tendering a copy of said documents to her personally at her place of business (a copy of

the Summons and Affidavit of Service is attached hereto).  Therefore, Defendant's answer was due

on February 5, 2008.  As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully

request entry of default.

/s/   Cecilia M. Scanlon

## CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 26th day of February 2008:

> Ms. Regina Zatar, Registered Agent
> Marlene's Trucking IL, Inc.
> 4711 Midlothian Tpk. #11
> Crestwood, IL   60445

/s/   Cecilia M. Scanlon

Cecilia M. Scanlon
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